

(b) (6), (b) (3)

From: Nam, Ed
Sent: Wednesday, August 01, 2018 9:58 AM
To: Koerber, Mike; Smith, Darcie; Sasser, Erika; Rimer, Kelly
Cc: Cain, Alexis; Siegel, Kathryn; Furey, Eileen
Subject: Recommendations for hybrid approach on EtO

Mike, Erika, Darcie, Kelly,

Thanks for the call yesterday. I wanted to follow up on a few items. I also set up a call with Mike at 4:30 (EST), please let me know if that works.

The list below is our feedback on your request on the most recent ADD call for thresholds and prioritization on next steps:

Coordination with states to prioritize the Health Sector:

- all EtO sources that contribute to NATA-estimated census tract risks of 100 in a million or greater
- additional sources that by themselves create a maximum individual risk of 100 in a million or greater, according to NATA.
- all commercial EtO sterilizers (see recommendations below)
- all hospital EtO sterilizers that still use EtO (see recommendations below)

We do request that ver2 be shared within EPA.

These are some ideas that we've been tossing around here. Some are suggestions for the hybrid next steps for you to consider:

HQ reach out to:

- Ethylene Oxide Sterilizer Association (EOSA)
 - message: back vents can and should be controlled at all commercial sterilizers
 - Region 5 can leverage relationship with Kathy Hoffman, Senior Vice President - Global Environmental, Health & Safety and Technical Services at Sterigenics and past EOSA President, to advance message with EOSA
 - Kathy told us that she has already spoken to EOSA members about back vent project and other actions at Willowbrook
- American Hospital Association (AHA)
 - message: new IRIS value shows higher risk from EtO than previously understood
 - note, AHA is headquartered in Chicago and Region 5 can help with engagement

Once the above universe of sources has been identified, regions, in coordination with states:

- engage with sources to obtain information (including modeling parameters)
- conduct regional modeling with improved inputs (in comparison to NATA)
- engage with state partners to learn about facility processes and operating permit(s) and determine what control technologies are in place
- if modelled risk confirmed, work with facility to determine control technology options
- work with state partners to facilitate necessary permit modifications
- conduct appropriate post-construction stack tests to determine extent of control achieved
- study the impact of fugitive emissions (consider FLIR cameras, ambient studies, or temporary total enclosure)

Region 5 EtO contact: Alexis Cain

Finally, I wanted to bring to your attention a poster that some of our staff have been working on for the upcoming National Ambient Monitoring Conference. It features the Sterigenics monitoring. As you can see from the attachment, the poster is focused on the science and makes no mention of Willowbrook, Sterigenics or NATA. Given that we need a scientific breakthrough for lower detection limits for EtO, we think that this is important work to present. Are you ok with us presenting the poster? The one thought I had was that we can remove the faded satellite map in the background if needed (as the location can be identified with some effort)

Thanks,

-Ed

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Subject: Special Purpose Call: NATA - Next steps on EtO facilities
Location: Line 866-299-3188 code: 707-6865#

Start: Wed 8/8/2018 3:00 PM
End: Wed 8/8/2018 4:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Perez, Idalia
Required Attendees: Perez, Idalia; Air Division Directors and Deputies; Koerber, Mike; Whitlow, Jeff; Smith, Darcie; Sasser, Erika; Jones, Rhea; Rimer, Kelly
Optional Attendees: Filippelli, John; Stenger, Wren; Smith, John; Wortman, Eric; Hestmark, Martin; Smith, Mark A.

This is a follow-up discussion to yesterday's ADD call.